St Catherine's Aged Care Services

Performance Report

162-166 Balaclava Road
EASTWOOD NSW 2122
Phone number: 02 9805 1655

**Commission ID:** 1470

**Provider name:** St Catherine's Aged Care Services

**Site Audit date:** 8 January 2020 to 10 January 2020

# Overall assessment of this Service

|  |  |
| --- | --- |
| **Standard 1 Consumer dignity and choice** | **Compliant** |
| Requirement 1(3)(a) | Compliant |
| Requirement 1(3)(b) | Compliant |
| Requirement 1(3)(c) | Compliant |
| Requirement 1(3)(d) | Compliant |
| Requirement 1(3)(e) | Compliant |
| Requirement 1(3)(f) | Compliant |
| **Standard 2 Ongoing assessment and planning with consumers** | **Compliant** |
| Requirement 2(3)(a) | Compliant |
| Requirement 2(3)(b) | Compliant |
| Requirement 2(3)(c) | Compliant |
| Requirement 2(3)(d) | Compliant |
| Requirement 2(3)(e) | Compliant |
| **Standard 3 Personal care and clinical care** | **Non-compliant** |
| Requirement 3(3)(a) | Non-compliant |
| Requirement 3(3)(b) | Compliant |
| Requirement 3(3)(c) | Compliant |
| Requirement 3(3)(d) | Compliant |
| Requirement 3(3)(e) | Compliant |
| Requirement 3(3)(f) | Compliant |
| Requirement 3(3)(g) | Compliant |
| **Standard 4 Services and supports for daily living** | **Compliant** |
| Requirement 4(3)(a) | Compliant |
| Requirement 4(3)(b) | Compliant |
| Requirement 4(3)(c) | Compliant |
| Requirement 4(3)(d) | Compliant |
| Requirement 4(3)(e) | Compliant |
| Requirement 4(3)(f) | Compliant |
| Requirement 4(3)(g) | Compliant |
| **Standard 5 Organisation’s service environment** | **Compliant** |
| Requirement 5(3)(a) | Compliant |
| Requirement 5(3)(b) | Compliant |
| Requirement 5(3)(c) | Compliant |
| **Standard 6 Feedback and complaints** | **Compliant** |
| Requirement 6(3)(a) | Compliant |
| Requirement 6(3)(b) | Compliant |
| Requirement 6(3)(c) | Compliant |
| Requirement 6(3)(d) | Compliant |
| **Standard 7 Human resources** | **Compliant** |
| Requirement 7(3)(a) | Compliant |
| Requirement 7(3)(b) | Compliant |
| Requirement 7(3)(c) | Compliant |
| Requirement 7(3)(d) | Compliant |
| Requirement 7(3)(e) | Compliant |
| **Standard 8 Organisational governance** | **Compliant** |
| Requirement 8(3)(a) | Compliant |
| Requirement 8(3)(b) | Compliant |
| Requirement 8(3)(c) | Compliant |
| Requirement 8(3)(d) | Compliant |
| Requirement 8(3)(e) | Compliant |

# Detailed assessment

This performance report details the Commission’s assessment of the provider’s performance, in relation to the service, against the Aged Care Quality Standards (Quality Standards). The Quality Standard and requirements are assessed as either compliant or non-compliant at the Standard and requirement level where applicable.

The report also specifies areas in which improvements must be made to ensure the Quality Standards are complied with.

The following information has been taken into account in developing this performance report:

* the Assessment Team’s report for the Site Audit; the Site Audit report was informed by a site assessment, observations at the service, review of documents and interviews with staff, consumers/representatives and others
* the provider’s response to the Site Audit report received 4 February 2020

# STANDARD 1 COMPLIANTConsumer dignity and choice

### Consumer outcome:

1. I am treated with dignity and respect, and can maintain my identity. I can make informed choices about my care and services, and live the life I choose.

### Organisation statement:

1. The organisation:
2. has a culture of inclusion and respect for consumers; and
3. supports consumers to exercise choice and independence; and
4. respects consumers’ privacy.

## Assessment of Standard 1

Most sampled consumers confirmed that they are treated with dignity and respect, can maintain their identity, make informed choices about their care and services and live the life they choose.

For example:

* Consumers interviewed confirmed they are treated with respect. For example: “when I need assistance with my personal care in the shower they are always respectful in the way provide the care.”
* All consumers interviewed said they have a say in what they do every day and are always encouraged to do as much as possible for themselves as this helps maintain their independence. Consumers said care and lifestyle staff understand what is important to them and are not judgemental about the choices they make*.*
* Consumers reported that staff always knock on closed doors and wait for an invitation before entering. They confirmed that staff close the door or draw the curtain prior to assisting consumers with their personal hygiene requirements.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers, asking them about the requirements, reviewing their care planning documentation (for alignment with the feedback from consumers) and testing staff understanding and application of the requirements under this Standard. The team also examined relevant documentation and drew relevant information from other consumer interviews and the assessment of other Standards.

* A review of the care planning documentation and interviews with staff demonstrated consistency with consumer interviews and documentation to effectively support consumers’ needs, preferences and goals.

The Quality Standard is assessed as Compliant as all of the six specific requirements have been assessed as Compliant.

## Assessment of Standard 1 Requirements

### Requirement 1(3)(a) Compliant

Each consumer is treated with dignity and respect, with their identity, culture and diversity valued.

### Requirement 1(3)(b) Compliant

Care and services are culturally safe.

### Requirement 1(3)(c) Compliant

Each consumer is supported to exercise choice and independence, including to:

1. make decisions about their own care and the way care and services are delivered; and
2. make decisions about when family, friends, carers or others should be involved in their care; and
3. communicate their decisions; and
4. make connections with others and maintain relationships of choice, including intimate relationships.

### Requirement 1(3)(d) Compliant

Each consumer is supported to take risks to enable them to live the best life they can.

### Requirement 1(3)(e) Compliant

Information provided to each consumer is current, accurate and timely, and communicated in a way that is clear, easy to understand and enables them to exercise choice.

### Requirement 1(3)(f) Compliant

Each consumer’s privacy is respected and personal information is kept confidential.

# STANDARD 2 COMPLIANTOngoing assessment and planning with consumers

### Consumer outcome:

### I am a partner in ongoing assessment and planning that helps me get the care and services I need for my health and well-being.

### Organisation statement:

1. The organisation undertakes initial and ongoing assessment and planning for care and services in partnership with the consumer. Assessment and planning has a focus on optimising health and well-being in accordance with the consumer’s needs, goals and preferences.

## Assessment of Standard 2

Overall sampled consumers confirmed that they feel like partners in the ongoing assessment and planning of their care and services.

For example:

* Consumers interviewed were able to confirm involvement in the care planning and review process on a regular basis. This occurs during monthly focus days and four monthly care plan reviews. Evidence of these processes was observed in care planning and progress note documentation. Consumers and representatives interviewed advised that they are generally well informed about the outcomes of assessment and planning and when the needs and condition of consumers change or if incidents occur.
* Staff interviewed advised that consumers and their representatives are consulted throughout the assessment and planning process. Consumers advised they are able to review their care plans with staff if they wish.
* One representative states that she trusts the staff at the service to provide care as planned for her father.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – reviewing their care planning documents in detail, asking consumers about how they are involved in care planning, and interviewing staff about how they use care planning documents and review them on an ongoing basis.

* The service demonstrated that each sampled consumer’s specific needs, goals and preferences are considered in care planning and assessment. This considered approach to care planning and assessment ensures that consumers health and well-being is optimised and that each consumer is enabled to live their best life.

The Quality Standard is assessed as Compliant as all of the five specific requirements have been assessed as Compliant.

## Assessment of Standard 2 Requirements

### Requirement 2(3)(a) Compliant

Assessment and planning, including consideration of risks to the consumer’s health and well-being, informs the delivery of safe and effective care and services.

### Requirement 2(3)(b) Compliant

Assessment and planning identifies and addresses the consumer’s current needs, goals and preferences, including advance care planning and end of life planning if the consumer wishes.

### Requirement 2(3)(c) Compliant

The organisation demonstrates that assessment and planning:

1. is based on ongoing partnership with the consumer and others that the consumer wishes to involve in assessment, planning and review of the consumer’s care and services; and
2. includes other organisations, and individuals and providers of other care and services, that are involved in the care of the consumer.

### Requirement 2(3)(d) Compliant

The outcomes of assessment and planning are effectively communicated to the consumer and documented in a care and services plan that is readily available to the consumer, and where care and services are provided.

### Requirement 2(3)(e) Compliant

Care and services are reviewed regularly for effectiveness, and when circumstances change or when incidents impact on the needs, goals or preferences of the consumer.

# STANDARD 3 NON-COMPLIANTPersonal care and clinical care

### Consumer outcome:

1. I get personal care, clinical care, or both personal care and clinical care, that is safe and right for me.

### Organisation statement:

1. The organisation delivers safe and effective personal care, clinical care, or both personal care and clinical care, in accordance with the consumer’s needs, goals and preferences to optimise health and well-being.

## Assessment of Standard 3

Overall sampled consumers did consider that they receive personal care and clinical care that is safe and right for them.

For example:

* Consumers and representatives interviewed felt the care they receive at the service is safe and they have a say about how they receive their care. Representatives stated they trust the staff to deliver safe and quality care.
* Consumers and representatives interviewed at the service confirmed that they are able to see a medical officer of their choice and other allied health and medical professionals as they require. One representative raised concern to the Assessment Team about communication back to her from the service after her father’s medical officer visits and this was actioned during the re-accreditation audit.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – their care plans and assessments were reviewed and staff were asked about how they ensure the delivery of safe and effective care for consumers. The team also examined relevant documents.

* Assessment and planning is individualised and consists of a monthly focus day and four monthly care plan reviews. An annual care conference is undertaken for all consumers at the service where all aspects of care are discussed and reviewed including review of advanced care directives if present. There is an established hierarchy of care at the service consisting of care manager, registered and enrolled nurses and care staff who are all involved in assessment and planning of consumer care.

The Assessment Team found that six of seven specific requirements were met.

* Regarding management of wound care, the service does not always adhere to best practice recommendations when documenting the care delivered to wounds at the service. Wound photography is taken without the addition of the necessary identifiers of consumer name and wound location included in the photographs which could lead to the photographs being uploaded into the wrong consumer’s file. Wound assessments and dressing selection were found to be inconsistent and included assessment of the impact of the wound care product on the skin as opposed to assessment of the wound itself. One consumer was found with a dressing rolled up under stockings and the wound had adhered to the stockings.

The Quality Standard is assessed as Non-compliant as one of the seven specific requirements have been assessed as Non-compliant.

### Assessment of Standard 3 Requirements

### Requirement 3(3)(a) Non-compliant

Each consumer gets safe and effective personal care, clinical care, or both personal care and clinical care, that:

1. is best practice; and
2. is tailored to their needs; and
3. optimises their health and well-being.

Generally, consumers and representatives felt they received the care they needed. Although management of pain, restraints and the use of psychotropic medications is tailored to optimise consumer’s health and well-being, wound management, including the assessment, selection of dressings and documentation of wounds does not always follow best practice. Wound photography is done without inclusion of consumer or site identification. Wound assessments are documented containing assessment of the impact of the dressing product on the skin, instead of the wound itself. The service has committed to update their clinical policy and procedures and provide additional training and education to ensure nursing staff are aware of best practice wound management.

### Requirement 3(3)(b) Compliant

Effective management of high impact or high prevalence risks associated with the care of each consumer.

### Requirement 3(3)(c) Compliant

The needs, goals and preferences of consumers nearing the end of life are recognised and addressed, their comfort maximised and their dignity preserved.

### Requirement 3(3)(d) Compliant

Deterioration or change of a consumer’s mental health, cognitive or physical function, capacity or condition is recognised and responded to in a timely manner.

### Requirement 3(3)(e) Compliant

Information about the consumer’s condition, needs and preferences is documented and communicated within the organisation, and with others where responsibility for care is shared.

### Requirement 3(3)(f) Compliant

Timely and appropriate referrals to individuals, other organisations and providers of other care and services.

### Requirement 3(3)(g) Compliant

Minimisation of infection related risks through implementing:

1. standard and transmission based precautions to prevent and control infection; and
2. practices to promote appropriate antibiotic prescribing and use to support optimal care and reduce the risk of increasing resistance to antibiotics.

# STANDARD 4 COMPLIANTServices and supports for daily living

### Consumer outcome:

1. I get the services and supports for daily living that are important for my health and well-being and that enable me to do the things I want to do.

### Organisation statement:

1. The organisation provides safe and effective services and supports for daily living that optimise the consumer’s independence, health, well-being and quality of life.

## Assessment of Standard 4

Most of the consumers confirm that they get the services and supports for daily living that are important for my health and well-being and that enable me to do the things I want to do.

For example:

* A number of consumers interviewed commented that they are supported to do the activities they enjoy. One consumer commented “the staff here are wonderful at ensuring I get up for my shower, before I head over to the chapel or the activity room.” “I really enjoy the activities I attend.” Two consumers said that they are supported by care staff and lifestyle staff to continue to join in their favourite activities on a regular basis. They confirmed they would be very upset if they were unable to attend bingo as it is the highlight of their week.
* A few consumers interviewed discussed how they are supported to keep in contact with family and friends by phone. One consumer said being able to speak to friends and family by phone has “maintained a lovely group of friends and family members with whom I can chat at any time, I feel very blessed.”
* Most of consumers said they liked the food while some of them said they thought the food could be improved especially the evening meal. Other consumers said they enjoy the food most of the time but acknowledged not everybody could be pleased all the time. However, overall, consumers thought the food was very good most of the time.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – observations were made, consumers were asked about the things they like to do and how these things are enabled or supported by the service and staff were asked about their understanding and application of the requirements. The team also examined relevant documents.

* Most of consumers said there were sufficient lifestyle staff to assist consumers to attend the various activities that were scheduled each day. One consumer said if you cannot read the schedule any of the care staff or the lifestyle staff will read if for you. One consumer said that “the lifestyle staff are very helpful when it comes to reminding us of the activities we want to attend each day. What would we do without them?”

The Quality Standard is assessed as Compliant as all of the seven specific requirements have been assessed as Compliant.

## Assessment of Standard 4 Requirements

### Requirement 4(3)(a) Compliant

Each consumer gets safe and effective services and supports for daily living that meet the consumer’s needs, goals and preferences and optimise their independence, health, well-being and quality of life.

### Requirement 4(3)(b) Compliant

Services and supports for daily living promote each consumer’s emotional, spiritual and psychological well-being.

### Requirement 4(3)(c) Compliant

Services and supports for daily living assist each consumer to:

1. participate in their community within and outside the organisation’s service environment; and
2. have social and personal relationships; and
3. do the things of interest to them.

### Requirement 4(3)(d) Compliant

Information about the consumer’s condition, needs and preferences is communicated within the organisation, and with others where responsibility for care is shared.

### Requirement 4(3)(e) Compliant

Timely and appropriate referrals to individuals, other organisations and providers of other care and services.

### Requirement 4(3)(f) Compliant

Where meals are provided, they are varied and of suitable quality and quantity.

### Requirement 4(3)(g) Compliant

Where equipment is provided, it is safe, suitable, clean and well maintained.

# STANDARD 5 COMPLIANTOrganisation’s service environment

### Consumer outcome:

1. I feel I belong and I am safe and comfortable in the organisation’s service environment.

### Organisation statement:

1. The organisation provides a safe and comfortable service environment that promotes the consumer’s independence, function and enjoyment.

## Assessment of Standard 5

Overall consumers interviewed indicated that they feel they belong in the service, and feel safe and comfortable in the service environment.

For example:

* All the consumers interviewed by the Assessment Team commented they felt very safe. When asked if they felt safe at night, they said they felt very safe during the night. Also, they knew they were safe as there were staff nearby to assist them if required.
* When asked, consumers said that they feel very much at home in their room. So when visitors came to see them they could either visit in their room or in one of the common areas.
* Consumers interviewed said when visitors came to visit them staff would often ask would they like a cup of tea and a biscuit. One consumer said this made them feel proud of the place where she lived, commenting I feel very privileged to live here in this lovely service.
* Consumers interviewed said they were impressed with the laundry and cleaning services as they are both very well done. The maintenance officer ensures all the work is done on a regular basis as well as completing all extra maintenance that needs to be completed.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team observed the service environment, spoke with consumers about their experience of the service environment and interviewed care staff about the suitability and safety of equipment. The team also examined relevant documents.

* When the Assessment Team toured the facility, comments were made regarding how clean the floors and furniture were so early in the morning. Also, how well the gardens were attended even given there was heavy smog over Sydney, the gardens still appeared to look cared for. Consumers when asked if the home was always clean early each day, agreed the cleaning staff do an excellent job every day, even on the weekends.

The Quality Standard is assessed as Compliant as all of the three specific requirements have been assessed as Compliant.

## Assessment of Standard 5 Requirements

### Requirement 5(3)(a) Compliant

The service environment is welcoming and easy to understand, and optimises each consumer’s sense of belonging, independence, interaction and function.

### Requirement 5(3)(b) Compliant

The service environment:

1. is safe, clean, well maintained and comfortable; and
2. enables consumers to move freely, both indoors and outdoors.

### Requirement 5(3)(c) Compliant

Furniture, fittings and equipment are safe, clean, well maintained and suitable for the consumer.

# STANDARD 6 COMPLIANTFeedback and complaints

### Consumer outcome:

1. I feel safe and am encouraged and supported to give feedback and make complaints. I am engaged in processes to address my feedback and complaints, and appropriate action is taken.

### Organisation statement:

1. The organisation regularly seeks input and feedback from consumers, carers, the workforce and others and uses the input and feedback to inform continuous improvements for individual consumers and the whole organisation.

## Assessment of Standard 6

Most consumers said that they are encouraged and supported to give feedback and make complaints, and that appropriate action is taken.

For example:

* Consumers interviewed demonstrated that they knew how to make a complaint, that management and staff were approachable and that they felt comfortable raising any concerns, issues or complaints. Consumers said that management responds promptly to any concerns and complaints.
* Consumers interviewed recognised improvements made at the service in response to complaints and feedback.
* In response to complaints about missing laundry the service contracted a new external provider to be responsible for the laundry, cleaning and maintenance. Consumers reported to the Assessment Team that since the implementation of the new provider, they have not had any missing clothing.

To understand the consumer’s experience and how the organisation understands and applies the requirements within this Standard, the Assessment Team sampled the experience of consumers – asking them about how they raise complaints and the organisation’s response. The team also examined the complaints register, complaints trend analysis and tested staff understanding and application of the requirements under this Standard.

* The service provides information regarding the complaints process through consumer meetings and the provision of written materials such as consumer handbook, brochures and agreements which detail the steps available to consumers and representatives on how to make complaints both internally and externally. Details for advocacy and language services are provided to consumers. A review of the complaints’ register, continuous improvement logs and care planning documentation demonstrated the organisation’s approach to reviewing and acting on complaints.

The Quality Standard is assessed as Compliant as all of the four specific requirements have been assessed as Compliant.

## Assessment of Standard 6 Requirements

### Requirement 6(3)(a) Compliant

Consumers, their family, friends, carers and others are encouraged and supported to provide feedback and make complaints.

### Requirement 6(3)(b) Compliant

Consumers are made aware of and have access to advocates, language services and other methods for raising and resolving complaints.

### Requirement 6(3)(c) Compliant

Appropriate action is taken in response to complaints and an open disclosure process is used when things go wrong.

### Requirement 6(3)(d) Compliant

Feedback and complaints are reviewed and used to improve the quality of care and services.

# STANDARD 7 COMPLIANTHuman resources

### Consumer outcome:

1. I get quality care and services when I need them from people who are knowledgeable, capable and caring.

### Organisation statement:

1. The organisation has a workforce that is sufficient, and is skilled and qualified, to provide safe, respectful and quality care and services.

## Assessment of Standard 7

Overall sampled consumers indicated that they get quality care and services when they need them and from people who are knowledgeable, capable and caring.

For example:

* Consumers and representatives said staff are responsive to consumers’ needs. They said staff understand consumers’ routines and are reliable as to the time they provide care and support. Consumers said they do not often ring their call bells to request assistance due to staff reliability and frequent checking by staff while they work and staff attending to them as necessary.
* Representatives particularly expressed a high level of satisfaction with the availability and skills of staff. They said they have no concerns about the consumers’ care when they are not there as they are confident that staff provide consumers with the level of care they expect.
* Staff did not identify any issues regarding the adequacy of staff numbers. Resident/relative meeting minutes, and staff meeting minutes, did not identify any issues with the adequacy of staff numbers or skills.

To understand the consumer’s experience and how the organisation understands and applies the individual requirements within this Standard, the Assessment Team spoke with consumers about their experience of the staff, interviewed staff, and reviewed a range of records including staff rosters, training records and performance reviews.

* Consumers spoke highly about the standard of care and support provided to them by staff. They said there are enough staff and their care needs are reliably supported so they seldom need to ring their call bells. A review of documents showed that absent staff are replaced when necessary so that shifts are not worked short-staffed.

The Quality Standard is assessed as Compliant as all of the five specific requirements have been assessed as Compliant.

## Assessment of Standard 7 Requirements

### Requirement 7(3)(a) Compliant

The workforce is planned to enable, and the number and mix of members of the workforce deployed enables, the delivery and management of safe and quality care and services.

### Requirement 7(3)(b) Compliant

Workforce interactions with consumers are kind, caring and respectful of each consumer’s identity, culture and diversity.

### Requirement 7(3)(c) Compliant

The workforce is competent and the members of the workforce have the qualifications and knowledge to effectively perform their roles.

### Requirement 7(3)(d) Compliant

The workforce is recruited, trained, equipped and supported to deliver the outcomes required by these standards.

### Requirement 7(3)(e) Compliant

Regular assessment, monitoring and review of the performance of each member of the workforce is undertaken.

# STANDARD 8 COMPLIANTOrganisational governance

### Consumer outcome:

1. I am confident the organisation is well run. I can partner in improving the delivery of care and services.

### Organisation statement:

1. The organisation’s governing body is accountable for the delivery of safe and quality care and services.

## Assessment of Standard 8

Overall sampled consumers indicated that the organisation is well run and that they can partner in improving the delivery of care and services.

For example:

* Consumers and representatives expressed the view that the service is well run, and that management communicate effectively with them. They spoke highly about the performance of staff working in all areas of the home.
* Consumers and representatives are informally involved in discussions about the consumers’ care needs particularly when there is a change or an incident. Formal care plan reviews are undertaken with consumers and/or representatives at least annually. Consumers and representatives said they find the resident/relative meetings useful for giving feedback about care, services and lifestyle. Consumers and representatives gave examples of where they have been involved in a partnership in improving the delivery of services.
* Feedback from consumers is sought through meetings, surveys, conversations and feedback forms. Consumers confirmed that they are aware of how to provide feedback and that management address concerns to their satisfaction and in a timely manner.

To understand how the organisation understands and applies the requirements within this Standard, the Assessment Team spoke with management and staff and reviewed relevant systems and processes relating to the organisational governance underpinning the delivery of care and services (as assessed through other Standards).

The organisation has effective governance systems to ensure that service’s management and the Board are aware of any risks to consumers or areas that require improvement.

The Quality Standard is assessed as Compliant as all of the five specific requirements have been assessed as Compliant.

## Assessment of Standard 8 Requirements

### Requirement 8(3)(a) Compliant

Consumers are engaged in the development, delivery and evaluation of care and services and are supported in that engagement.

### Requirement 8(3)(b) Compliant

The organisation’s governing body promotes a culture of safe, inclusive and quality care and services and is accountable for their delivery.

### Requirement 8(3)(c) Compliant

Effective organisation wide governance systems relating to the following:

1. information management;
2. continuous improvement;
3. financial governance;
4. workforce governance, including the assignment of clear responsibilities and accountabilities;
5. regulatory compliance;
6. feedback and complaints.

### Requirement 8(3)(d) Compliant

Effective risk management systems and practices, including but not limited to the following:

1. managing high impact or high prevalence risks associated with the care of consumers;
2. identifying and responding to abuse and neglect of consumers;
3. supporting consumers to live the best life they can.

### Requirement 8(3)(e) Compliant

Where clinical care is provided—a clinical governance framework, including but not limited to the following:

1. antimicrobial stewardship;
2. minimising the use of restraint;
3. open disclosure.

# Areas for improvement

Areas have been identified in which improvements must be made to ensure compliance with the Quality Standards. This is based on non-compliance with the Quality Standards as described in this performance report.

* Standard 3, Requirement 3(a)